

the call may exceed those benchmarks."³¹ This proposal would require extremely complex computer programs and significantly more memory than the other alternatives proposed by the Commission and the Intellicall Companies, e.g., maximum rates, average rates, etc. While the proposal does not involve the disclosure of specific rates, it nevertheless involves substantially similar computations. Under this proposal, an OSP must maintain its own rating tables, the Commission's proposed benchmarks, and yet additional software to determine the percentage by which the call will exceed the benchmark. There is no record support for this proposal and the Commission should summarily reject it.

³¹ See Comments of Telecommunications Resellers Association, at 8.

III. CONCLUSION

For all the foregoing reasons, the Intellicall Companies and Network Operator Services, Inc. respectfully request that the Commission adopt the suggestions enunciated herein.

Respectfully submitted,

**THE INTELICALL COMPANIES and
NETWORK OPERATOR
SERVICES, INC.**

By: 

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August 16, 1996

DECLARATION

RON HUTCHISON, being duly sworn according to law, upon his oath deposes and says:

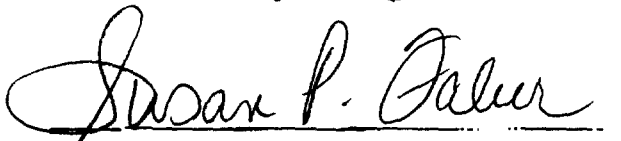
1. I am Chief Operating and Financial Officer of Network Operator Services, Inc., and am authorized to verify the foregoing Joint Reply Comments on their behalf.

2. I have read the foregoing Joint Reply Comments, and the statements made therein are true and correct to the best of my knowledge and belief.

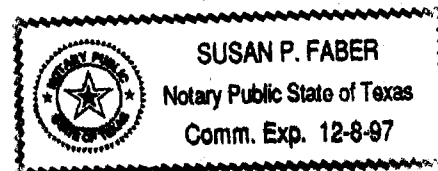


Ron Hutchison
Chief Operating and Financial Officer

Sworn and subscribed before me
this 15 day of August, 1996.



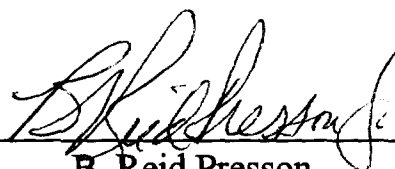
Notary Public
My Commission Expires 12-8-97



DECLARATION

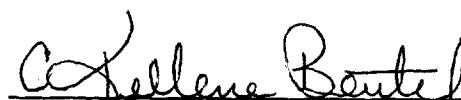
B. REID PRESSON, being duly sworn according to law, upon his oath
deposes and says:

1. I am Vice President of the Intellicall Companies, and am authorized to
verify the foregoing Joint Reply Comments on their behalf.
2. I have read the foregoing Joint Reply Comments, and the statements made
therein are true and correct to the best of my knowledge and belief.

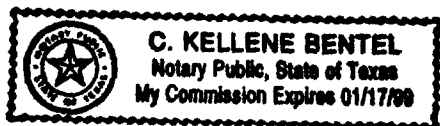


B. Reid Presson
Vice President

Sworn and subscribed before me
this 16th day of August, 1996.

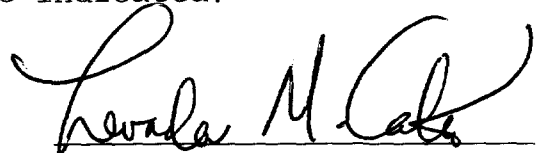


Notary Public
My Commission Expires



CERTIFICATE OF SERVICE

I, Levada M. Catron, hereby certify that I have on this 16th day of August, 1996, caused to be served a copy of the foregoing Reply Comments upon the following, via first class mail, postage prepaid unless otherwise indicated:


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